

EXHIBIT A

Calello Music Group, Inc.

November 1, 2023

This Document Is Being Prepared by Charles Calello to Demonstrate Why the Musical Composition “Levitating” Infringes on The Musical Compositions “Wiggle and Giggle All Night Long” and It’s Spanish Version, “Don Diablo,”

For the past sixty years I’ve worked as a record producer and music arranger and have had 42 top ten records. It has been my experience that albums (CDs) when they are being created, usually start with a theme. For example, “What’s Going On” (Marvin Gaye), Sgt. “Pepper’s Lonely Hearts Club Band” (The Beatles), “Born to Run” (Bruce Springsteen), to name a few. They usually have one key song that helps in its creation. According to Dua Lipa, “Future Nostalgia’s”, theme was created after writing “Levitating.” (Dua Lipa explains it live on the Stephen Colbert show) (<https://www.youtube.com/watch?v=4ceGrAlZlBU>) starting at 3:29.

The question is: Did Dua Lipa’s, team with Sarah Hudson, Clarence Coffee Jr & Koz infringe on the copyrighted song by Sandy Linzer and L Russel Brown, entitled, “Wiggle and Giggle All Night Long,” and its Spanish version, “Don Diablo,” with their composition “Levitating.”

The famous composer and conductor with more than 20 awards to his credit, Leonard Bernstein, in talking about the first movement of Beethoven’s Fifth Symphony said, it just wasn’t the 4 notes (G G G Eb) that made his symphony great, it was what followed. He put it this way: *“So economical that almost every bar of it is a direct development of these four notes. - People have wondered what it is that in douse this musical figure with such potency. - The truth is that the real meaning lies in the notes of all the five hundred measures that follow it.”*

(Hear the entire discourse, <https://www.youtube.com/watch?v=j5u1R-OzeSs>)

In any copyright infringement claim, the most important musicological areas to examine and compare are the **Melody** (or pitch), the **Rhythmic Elements**, along with **the Lyrics** and **Structure**. In “Pop” music, infringement may also be determined by the way the song is **Performed**.

Below, I’ve transcribed all relevant portions of said pieces into notation (musical notes). The musical notation will show visually how the musical compositions are connected through the five elements, **MELODY. RHYTHM, LYRICS, STRUCTURE** and **PERFORMANCE**.

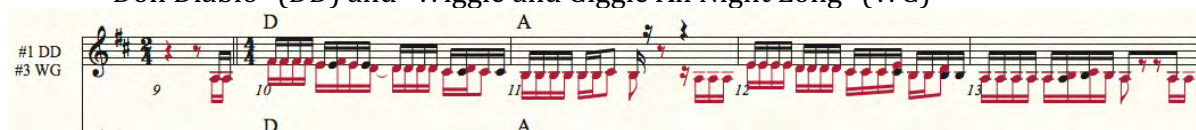
MELODY:

A melody, (or tune), voice, or line, is a linear succession of musical tones that the listener perceives as a single entity. In its most literal sense, **a melody is a combination of pitch and rhythm**, while more figuratively, **the term can include other musical elements such as tonal color and/or chords**. It is the foreground to the background accompaniment.

Pitch: Pitch is a perceptual property of sounds that allows their ordering on a frequency-related scale, or more commonly, pitch is the quality that makes it possible to judge sounds as "higher" and "lower" in the sense associated with musical melodies. Pitch is a major auditory attribute of musical tones, along with duration, loudness, and timbre.

Please note the similarities in the following melodies.

"Don Diablo" (DD) and "Wiggle and Giggle All Night Long" (WG)



"Don Diablo" (DD) "Levitating" (LEV)



Starting in the second bar, (bar 10) the melody in both songs move in the exact same direction except for one 8th note in bar 11. Also, the intervals are evenly matched, even being in different modes (major and minor keys).

There are 23 notes in "Wiggle and Giggle All Night Long"

There are 26 notes in "Don Diablo"

There are 23 notes in "Levitating,"

Please note that 22 of the notes in "Levitating" are identical to the notes in "Don Diablo"

RHYTHM:

Rhythm is the pattern of sound, silence, and emphasis in a song. In music theory, rhythm refers to the recurrence of notes and rests (silences) in time. **When a series of notes and rests repeats, it forms a rhythmic pattern.** In addition to indicating *when* notes are played, musical **rhythm also stipulates *how long they are played*** and with what intensity. This creates different note durations and different types of accents.

In "Wiggle and Giggle All Night Long" there are a total of 23 notes that make up the theme

In "Don Diablo" there are a total of 26 notes that make up the theme

In "Levitating" there are a total of 23 notes that make up the theme.

Please note, 22 of the notes in "Levitating" use the same rhythm as "Don Diablo."



LYRICS:

Lyrics are words that make up a song, usually consisting of verses and choruses. Some lyrics are abstract, almost unintelligible, and, in such cases, their explication emphasizes

form, articulation, meter, and symmetry of expression. Rappers can also create lyrics that are meant to be spoken rhythmically rather than sung.

“Wiggle and Giggle All Night Long”

Walk-in' down the / Street When I /
saw this hand-some / sold-ier boy
Win-kin', win-kin', / win-kin' at me

“Levitating” -

if you wan-na / run a-way with
me, I know a / gal-a-xy And
I can take you /for a ride

The way the lyric is formed in “Levitating,” the Dua Lipa team seems to have used the same meter and articulated to the lyric in “Wiggle and Giggle All Night Long” and/or “Don Diablo.”

The meter and symmetry of expression are the same as “Wiggle and Giggle All Night Long” & “Don Diablo.”

STRUCTURE:

A structure is an arrangement and organization of interrelated elements in a material object or system, or the object or system so organized. Types of structure include a hierarchy, a network featuring many-to-many links, or a lattice featuring connections between components that are neighbors in space.

“Levitating,” is structured in the following manner.

There are 24 bars of music that make up the master recording, “Levitating,”

Verse 8 bars - 6 of those bars are a direct copy of “Wiggle and Giggle All Night Long” & “Don Diablo.”
Pre Chorus 4 bars - Repeated
Chorus 4 Bars - Repeated
Verse - Rap 4 Bars - Music from Verse - Repeated
Interlude 4 Bars

Out of those 24 bars, 6 of them are a direct copy of “Wiggle and Giggle All Night Long” & “Don Diablo.” That makes up 25% of the total musical composition being taken literally from “Wiggle and Giggle All Night Long” & “Don Diablo.”

Bars		1	2	3	4	5	6	7	8	# of Bars
WG & DD	Verse	WG & DD						WG & DD		6
LEV	Verse					LEV				2
LEV	Pre Chorus	LEV								4
LEV	Chorus	LEV								4
LEV	Verse Rap	LEV								4
LEV	Interlude	LEV								4
Number of Bars that make up musical part of "Levitating"										24

PERFORMANCE:

The action or process of carrying out or accomplishing an action, task, or function:

Tempo: In musical terminology, tempo also known as beats per minute, is the speed or pace of a given composition. In classical music, tempo is typically indicated with an instruction at the start of a piece and is usually measured in beats per minute. In modern classical compositions, a "metronome mark" in beats per minute may supplement or replace the normal tempo marking, while in modern genres like electronic dance music, tempo will typically simply be stated in BPM.

"Wiggle and Giggle All Night Long" Tempo (BPM 103)

"Don Diablo." Tempo (BPM 103)

"Levitating," Tempo (BPM 103)

Beat: In music and music theory, the beat is the basic unit of time, the pulse, of the mensural level. The beat is often defined as the rhythm listeners would tap their toes to when listening to a piece of music, or the numbers a musician counts while performing. In popular use, beat can refer to a variety of related concepts, including pulse, tempo, meter, specific rhythms, and groove.

"Wiggle and Giggle All Night Long" Bass Drum Plays all Quarter Notes

"Don Diablo." Bass Drum Plays all Quarter Notes

"Levitating," Bass Drum Plays all Quarter Notes

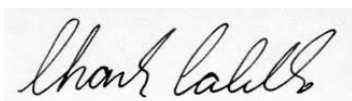
The Tempo and Beat of the master recording "Levitating" uses the exact same performance process as "Wiggle and Giggle All Night Long" & "Don Diablo."

The question now comes up, is "Wiggle and Giggle All Night Long" & "Don Diablo" just a musical idea or is it a copyrightable expression?

There is nothing in the public domain that has been presented where the Melody, Rhythmic Elements, Structure and Performance have influenced the writing of "Wiggle and Giggle All Night Long" or "Don Diablo," which would minimize the copyright. However, assuming the first 8 notes of "Levitating," was the beginning of an idea, the available options for the next 14 notes would have certainly indicated a degree of originality and creativity if some of them had been changed.

There were 12 notes in a scale (pitches) that could have been selected to create notes 9 through 22. If we would add a basic rhythm to one of those notes, such as a half notes, quarter notes, eighth notes, or 16th notes, the permutation on just those limited option, to created note #9, would have been one in 48. Since there were 14 additional notes that made up the 22-note passage, that scenario would have basically been improbable because it would have had to take place an additional 13 times.

Because of the numerous circumstances addressed above it is my conclusion that it would have been literally impossible for "Levitating" to have been created without one or more of the Dua Lipa team to have referenced the master recording of, "Wiggle and Giggle All Night Long" and/or "Don Diablo." There are just too many coincidences to prove otherwise.



Charles Calello

The Master Behind the Music

Calello's passion for music led him to embark on his musical career at the young age of 18, just months after he graduated from the first Music and Art's High School in the United States, in Newark, New Jersey. He took the first step of his musical Mecca when he began playing in local clubs, leaving the future to unfold quickly.

In 1958, Frankie Valli strolled into a nightclub in Newark, New Jersey, and was astounded by a band of young musicians performing live. Already with a hit of his own, with his then group, The Four Lovers, Valli knew the music he witnessed barreling off the stage was anything but ordinary. He asked who wrote the arrangements for the band, and quickly shook hands with Charles Calello.

During the next five years, while Calello was working as a musician and attending Manhattan School of Music, he and Valli developed a close relationship, which ultimately led to him becoming the arranger for "The Four Seasons." In the early Sixties, The Four Seasons helped spawn a chain of hit records that catapulted the group to stardom and assisted in creating a sound that is still unique today (Jersey Boys). During those early years, Calello arranged and/or produced several other top ten hit records included, *The Name Game*, with Shirley Ellis, *Blue Navy Blue*, with Diane Renay, *A Lover's Concerto*, with The Toys, and *Lightning Strikes*, with Lou Christie. In 1965-66 Calello replaced Nick Massi as the group's bassist and became a member of The Four Seasons and toured throughout that period.

After years of success with The Four Seasons, Calello went on to accept a position with Columbia Records (Sony Music) as a staff arranger/producer in late 1966. After producing and arranging the nationally acclaimed record for Laura Nyro, *Eli and The Thirteenth Confession*, he left Columbia Records and settled into a career as an independent arranger, producer and composer.

In the late sixties he arranged Frank Sinatra's *Watertown* album and the classic song by Neil Diamond, *Sweet Caroline*. He has worked with such diverse artists as, Al Kooper, Nancy Sinatra, Roberto Carlos, Bruce Springsteen, Barbra Streisand, Engelbert Humperdinck, Glen Campbell, Janis Ian, Barry Manilow, Juice Newton, and many others. In 1979 he had his own hit record with a disco version of "Sing, Sing, Sing".^[2] In 1992 he became principal arranger and assistant conductor of the Boca Pops in Boca Raton and later held the same position for the Sunshine Pops Orchestra.

Calello's talent continued to produce Top 10 Hits over the years, earning him international acclaim. His discography includes over 100 Billboard chart records, 30 of which were Top 10 Pop Hits, 10 of which were nominated for Grammys. He has also scored more than 60 television shows, over 250 commercials, and five motion pictures. His creative ability and diversity are exceeded only by the timeless nature and renowned quality portrayed in the rare elements easily witnessed throughout every facet of his work.

On Oct. 20, 2000, Calello was honored for his talent and artistic contribution to the music industry with an induction into the Vocal Group Hall of Fame as one of The Four Seasons.

Jersey Boys, a Tony award musical currently gracing the stage on Broadway, is about the life of Frankie Valli and The Four Seasons. Since Calello arranged many of original songs that are used in the play he is mentioned and glorified in the Broadway hit.

In addition to Calello's work as an arranger and producer, he actively continues to write stellar musical performances for Pops Orchestras and live shows, conducts Pops orchestras around the country for various artists and performs his own "hit records" in concert with his own show.

Calello is a published author. His book entitled, "Another Season," The Memoirs of Charlie Calello, tells his amazing story, as outlined above.

He has lectured at Miami University, FAU, in Boca Raton, FL, Northwood University in West Palm Beach, FL and the prestigious Berklee School of Music in Boston, Mass., where he spent 3 days lecturing on such various subjects as, Song Writing, Music Arranging and Publishing Music. He lectured the faculty on such subjects as the music business, starting a career in the entertaining industry, the value of publishing music and getting a job after college. In 2021 Calello was invited to attend a question-and-answer Zoom meeting for the Performing Arts students in Passaic, New Jersey. After covid he was invited back to speak directly to the music students and the faculty. In 2023 Calello was invited to conduct a Zoom, Master Class for ASMAC. (American Society of Music Arranger and Composers) It was view by music arrangers and composers all over the world.

The following is a list of the Billboard Hit Records Calello Arranged and/or Arranged and Produced:

Billboard

**Calello's
Billboard Magazine
Top 100**

	Year	Month	#	Song	Artist	Record Co.	Function
1	1963	January	1	Walk Like A Man	The 4 Seasons	Vee-Jay	Arranged
2	1965	December	1	Lightnin' Strikes	Lou Christie	MGM	Produced & Arranged
3	1974	November	1	My Eyes Adored You	Frankie Valli	Private Stock	Arranged
4	1977	February	1	Southern Nights	Glen Campbell	Capitol	Arranged
5	1965	September	2	A Lover's Concerto	The Toys	Dyno Voice	Arranged
6	1975	December	2	All By Myself	Eric Carmen	Arista	Arranged
7	1981	February	2	Angel Of The Morning	Juice Newton	Capitol	Arranged
8	1981	May	2	Queen Of Hearts	Juice Newton	Capitol	Arranged
9	1963.	June	3	Candy Girl	The 4 Seasons	Vee-Jay	Arranged
10	1964	December	3	The Name Game	Shirley Ellis	Congress	Produced & Arranged
11	1964.	February	3	Dawn	The 4 Seasons	Phillips	Arranged
12	1965	October	3	Let's Hang On	The 4 Seasons	Vee-Jay	Arranged
13	1975	May	3	Swearin' To God	Frankie Valli	Private Stock	Arranged
14	1976	November	3	I Like Dreamin'	Kenny Nolan	20th Century	Produced & Arranged
15	1969	June	4	Sweet Caroline	Neil Diamond	Uni	Arranged
16	1977	May	4	My Heart Belongs To Me	Barbra Streisand	Columbia	Co-Produced & Arranged
17	1964	April	6	Ronnie	The 4 Seasons	Phillips	Arranged
18	1964	January	6	Blue Navy Blue	Diane Renay	20th Century	Arranged
19	1981	October	7	The Sweetest Thing	Juice Newton	Capitol	Arranged
20	1982	August	7	Love's Been A Little Bit Hard On Me	Juice Newton	Capitol	Arranged
21	1965	March	8	The Clapping Song (Clap Pat)	Shirley Ellis	Congress	Produced & Arranged
22	1976	October	8	After The Lovin'	Engelbert Humperdinck	Epic	Co-Produced & Arranged
23	1966	January	9	Working My Way Back To You	The 4 Seasons	Phillips	Arranged
24	1964	August	10	Save It For Me	The 4 Seasons	Phillips	Arranged
25	1979	April	10	You Take My Breath Away	Rex Smith	Columbia	Produced & Arranged
26	1965	November	11	Don't Think Twice	The Wonder Who?	Phillips	Arranged
27	1976	May	11	Never Gonna Fall In Love Again	Eric Carmen	Arista	Arranged
28	1982	August	11	Break It To Me Gently	Juice Newton	Capitol	Arranged
29	1965	January	12	Bye, Bye, Baby	The 4 Seasons	Phillips	Arranged
30	1971	December	15	Don't Say You Don't Remember	Beverly Bremers	Scepter	Arranged

31	1964	February	16	Abigail Beeacher	Freddy Cannon	Warner	Arranged
32	1964	February	16	Stay	The 4 Seasons	Vee-Jay	Arranged
33	1966	March	16	Rhapsody In The Rain	Lou Christie	MGM	Produced & Arranged
34	1965	December	18	Attack	The Toys	Dyno Voice	Arranged
35	1967	August	18	I Make A Fool Of Myself	Frankie Valli	Phillips	Arranged
36	1964	November	20	Big Man In Town	The 4 Seasons	Phillips	Arranged
37	1977	April	20	Love's Grown Deep	Kenny Nolan	20th Centruy	Produced & Arranged
38	1977	November	21	Native New Yorker	Odyssey	RCA	Co-Produced & Arranged
39	1963	April	22	Ain't That A Shame	The 4 Seasons	Vee-Jay	Arranged
40	1964	April	22	Kiss Me Sailor	Diane Renay	20th Centruy	Arranged
41	1965	May	22	L-O-N-E-L-Y	Bobby Vinton	Epic	Arranged
42	1962	December	23	Santa Claus Is Coming To Town	The 4 Seasons	Vee-Jay	Arranged
43	1977	October	23	Daybreak	Barry Manilow	Arista	Arranged
44	1968	February	24	Will You Still Love Me Tomorrow	The 4 Seasons	Phillips	Arranged
44	1982	November	25	Heart Of The Night	Juice Newton	Capitol	Arranged
45	1983	October	26	Baby I Lied	Deborah Allen	RCA	Produced & Arranged
46	1969	May	27	Good Morning Starshine	Oliver	Jublee	Arranged
47	1976	November	27	Whispering/Cherchez La Femme	Dr. B. Savanan Band	RCA	Arranged
48	1983	August	27	Tell Her No	Juice Newton	Capitol	Arranged
49	1964	June	28	Alone	The 4 Seasons	Vee-Jay	Arranged
50	1967	December	29	To Give	Frankie Valli	Phillips	Arranged
51	1965	June	30	Girl Come Running	The 4 Seasons	Phillips	Arranged
52	1967	October	30	Watch The Flowers Grow	The 4 Seasons	Phillips	Arranged
53	1970	January	34	Breaking Up Is Hard To Do	Lenny Welch	Common U	Arranged
54	1965	May	35	Concrete And Clay	Eddie Rambeau	DynoVoice	Produced & Arranged
55	1963	July	36	Marlena	The 4 Seasons	Vee-Jay	Arranged
56	1963	October	36	New Mexican Rose'	The 4 Seasons	Vee-Jay	Composed & Arranged
57	1982	December	36	The Clapping Song (Clap Pat)	Pia Zadora	Elektra/Cur b	Produced & Arranged
58	1966	January	39	Girl You're Gonna Hurt Yourself	Frankie Valli	Smash	Composed & Arranged
59	1977	July	39	Sunflower	Glen Campbell	Capitol	Arranged
60	1966	April	40	Dum-De-Da	Bobby Vinton	Epic	Arranged
61	1966	June	44	Painter	Lou Christie	MGM	Produced & Arranged
62	1984	June	44	A Little Love	Juice Newton	RCA	Arranged
63	1966	March	45	Outside The Gates Of Heaven	Lou Christie	Colpix	Produced & Arranged
64	1963	July	47	Que Sera, Sera (Whatever Will Be Will Be)	The High Keys	Atco	Arranged
65	1968	April	49	If You Don't Want My Love	Robert John	Columbia	Arranged
66	1964	April	51	Gonna' Get Along Without You Now	Tracey Dey	Amy	Arranged
67	1965	February	51	Angel	Johnny Tillotson	MGM	Arranged

68	1966	October	51	A Symphony for Susan	The Arbors	Date	Arranged
69	1965	January	55	Dusty	The Rag Dolls	Mala	Arranged
70	1965	March	55	Poor Man's Son	The Reflections	Golden World	Arranged
71	1968	February	57	Love Is Blue	Al Martino	Capitol	Arranged
72	1978	May	57	Weekend Lover	Odyssey	RCA	Co-Produced & Arranged
73	1965	August	58	The Mouse	Soupy Sales	ABC-Paramount	Produced & Arranged
74	1966	February	59	Tears	Bobby Vinton	Epic	Arranged
75	1965	December	60	Little Boy In Grown Up Cloths	The 4 Seasons	Vee-Jay	Arranged
76	1968	December	61	Electric Stories	The 4 Seasons	Phillips	Arranged
77	1965	October	64	Toy Soldier	The 4 Seasons	Phillips	Arranged
78	1984	August	66	Can't Wait All Night	Juice Newton	RCA	Arranged
79	1967	February	67	Soul Time	Shirley Ellis	Columbia	Produced & Arranged
80	1965	November	70	Our World	Johnny Tillotson	MGM	Arranged
81	1963	September	75	Teenage Cleopatra	Tracey Dey	Liberty	Arranged
82	1964	August	75	Sincerely	The 4 Seasons	Vee-Jay	Arranged
83	1964	May	75	Be My Girl	The Four Evers	Smash	Arranged
84	1966	September	76	Baby Toys	The Toys	Dyno Voice	Arranged
85	1963	May	77	Soon	The 4 Seasons	Vee-Jay	Arranged
86	1965	May	78	The Puzzle Song	Shirley Ellis	Congress	Produced & Arranged
87	1976	August	78	We're All Alone	Frankie Valli	Private Stock	Produced & Arranged
88	1976	September	80	I'll Play The Fool	Dr. B. Savanan Band	RCA	Arranged
89	1977	April	81	My Best Friends Wife	Paul Anka	RCA	Produced & Arranged
90	1966	April	85	May My Heart Be Cast Into Stone	The Toys	Dyno Voice	Arranged
91	1968	April	87	Lili Marlene	Al Martino	Capitol	Arranged
92	1963	October	88	That's The Only Way	The 4 Seasons	Vee-Jay	Arranged
93	1983	November	90	Dirty Looks	Juice Newton	Capitol	Arranged
94	1964	September	91	Society Girl	The Rag Dolls	Parkway	Arranged
95	1963	December	93	Here Comes The Boy	Tracey Dey	Amy	Arranged
96	1963	March	94	Don't Mention My Name	Shepard Sisters	Atlantic	Arranged
97	1967	September	95	Penny Arcade	The Cyrle	Columbia	Produced & Arranged
98	1966	July	96	You're Nobody Till Somebody Loves You	The Wonder Who?	Phillips	Arranged
99	1966	March	96	Big Time	Lou Christie	Colpix	Produced & Arranged
100	1964	May	98	Across The Street	Lenny O'Henry	Atco	Composed & Arranged

Notable Country Hits Calello has Arranged and/or Arranged & Produced

1	1985	July	1	You Make Me Want To Make You Mine	Juice Newton	RCA	Arranged
2	1985	November	1	Hurt	Juice Newton	RCA	Arranged
3	1986	July	1	Both To Each Other	Newton/Rabbitt	RCA	Arranged
4	1988	January	1	I Wanna Dance With You	Eddie Rabbitt	RCA	Arranged
5	1988	May	1	The Wanderer	Eddie Rabbitt	RCA	Arranged
6	1982	August	2	Break It To Me Gently	Juice Newton	Capitol	Arranged
7	1983	August	4	Baby I Lied	Deborah Allen	RCA	Produced & Arranged
8	1986	March	4	Repetitive Regret	Eddie Rabbitt	RCA	Arranged
9	1986	April	5	Old Flame	Juice Newton	RCA	Arranged
10	1991	July	6	Since I Don't Have You	Ronnie Milsap	RCA	Arranged
11	1988	October	7	We Must Be Doing Something Right	Eddie Rabbitt	RCA	Arranged
12	1987	November	8	Tell Me True	Juice Newton	RCA	Arranged
13	1986	August	9	Cheap Love	Juice Newton	RCA	Arranged
14	1986	December	9	What Can I Do With My Heart	Juice Newton	RCA	Arranged
15	1986	November	9	Gotta Have You	Eddie Rabbitt	RCA	Arranged
16	1991	August	9	A Picture Of Me	Lorrie Morgan	RCA	Arranged
17	1992	May	14	Something In Red	Lorrie Morgan	RCA	Arranged

Notable Albums and CDs Calello has Appeared on as an Arranger and/or a Producer/Arranger

1	1962	The 4 Seasons	Big Girls Don't Cry and 12 Others	Arranged
2	1963	Diane Reney	Blue Navy Blue	Arranged
3	1963	The 4 Seasons	Ain't That A Shame and 11 Others	Arranged
4	1963	The 4 Seasons	Recorded Live On Stage	Arranged
5	1964	The 4 Seasons	Dawn Go Away and 11 Others	Arranged
6	1964	The 4 Seasons	The Four Seasons Greetings	Arranged
7	1964	The 4 Seasons	Rag Doll & 10 Other New Hit Songs	Arranged
8	1965	Shirley Ellis	The Name Game	Produced & Arranged
9	1965	The 4 Seasons	The 4 Seasons Gold Vault of Hits	Arranged & Artist
10	1965	The Toys	A Lover's Concerto	Arranged
11	1966	The 4 Seasons	Working My Way Back To You	Arranged & Artist
12	1967	The 4 Seasons	The Genuine Imitation Life Gazette	Arranged
13	1967	The Cyrkle	Red Rubber Ball Expanded	Produced & Arranged
14	1968	Janis Ian	Who Really Cares	Produced & Arranged
15	1968	Laura Nyro	Eli and the Thirteenth Confession	Co-Produced & Arranged
16	1968	The Cyrkle	Neon Expanded	Produced & Arranged
17	1969	Al Kooper	You Never Know Who Your Friends Are	Horn Arrangements & Vocals
18	1969	Frank Sinatra	Watertown	Arranged
19	1969	Frankie Valli	Timeless	Arranged
20	1970	Al Kooper	Easy Does It	Horn Arrangements
21	1975	Disco Tex	Disco Tex & The Sex-O-Lettes	Arranged
22	1975	Frankie Valli	Closeup	Arranged
23	1975	Laura Nyro	Smile	Co-Produced & Arranged
24	1976	Bette Midler	Live At Last	Arranged
25	1976	Bruce Springsteen	Born To Run	Strings Arrangements & Conductor
26	1977	Barbra Streisand	Superman	Co-Produced & Arranged
27	1977	Dr. Buzzard's	Dr. Buzzard's Original Savannah Band	Arranged
28	1977	Engelbert Humperdinck	After The Lovin'	Co-Produced & Arranged
29	1977	Engelbert Humperdinck	Christmas Tyme	Co-Produced & Arranged
30	1977	Franne Golde	Grannie Golde (Atlantic)	Co-Produced & Arranged
31	1977	Kenny Nolan	I Like Dreamin	Produced & Arranged
32	1978	Albert Hammond	When I Need You	Produced & Arranged
33	1978	Barry Manilow	Live	Arranged
34	1978	David Pomeranz	Time To Fly	Produced & Arranged
35	1978	Odyssey	Odyssey	Co-Produced & Arranged
36	1979	Barbra Streisand	Wet	Co-Produced & Arranged
37	1979	Billy Vera	Out of the Darkness	Arranged
38	1979	Engelbert Humperdinck	Last Of The Romantics	Produced & Arranged
39	1979	Odyssey	Hollywood Party Tonight	Co-Produced & Arranged
40	1979	Rex Smith	Sooner Or Later	Produced & Arranged
41	1979	Richie Havens	Connections	Produced & Arranged

42	1980	Rex Smith	Forever	Produced & Arranged
43	1980	The 4 Seasons	Live - Reunited	Co-Produced
44	1981	Helen Reddy	When I Dream	Arranged
45	1982	Roberto Carlos	Super Heroe	Arranged
46	1982	Various Artists	Lonely Lady (Soundtrack)	Produced & Arranged
47	1983	Roberto Carlos	Concavo Y Convexo	Arranged
48	1983	Various Artists	Rocky III (Soundtrack)	Arranged
49	1984	Roberto Carlos	Voce E Minha	Arranged
50	1985	Roberto Carlos	Mujer Pequena	Arranged
51	1986	Roberto Carlos	Roberto Carlos '86 (Portugues	Arranged
52	1986	Roberto Carlos	Roberto Carlos '86 (Spanish	Arranged
53	1987	Roberto Carlos	Roberto Carlos Columbia #4	Arranged
54	1988	Various Artists	Cry Baby (Soundtrack)	Arranged
55	1989	Kenny Rogers	I Prefer The Moonlight	Arranged
56	1989	Roger Williams	Phantom Of The Opera	Produced & Arranged
57	1991	Roberto Carlos	Roberto Carlos (1991)	Arranged
58	1991	Roy Rogers	Tribute	Arranged
59	1991	Various Artists	Good Fellows (Soundtrack)	Arranged
60	1993	Lorrie Morgan	Merry Christmas From London	Arranged
61	1993	Various Artists	Beverly Hillbillies (Soundtrack	Arranged
62	1998	Frankie Valli	Lady Put The Lights Out	Produce & Arranged
63	1998	Merle Haggard	Live At Billy Bob's Texas	Produced
64	1998	Pat Green	Live At Billy Bob's Texas	Produced
65	1999	Eddie Raven	Live At Billy Bob's Texas	Produced
66	1999	Gloria Estefan	Hold Me Thrill Me Kiss Me	Arranged
67	1999	Janie Fricke	Live At Billy Bob's Texas	Produced
68	1999	John Conlee	Live At Billy Bob's Texas	Produced
69	1999	Lynn Anderson	Live At Billy Bob's Texas	Produced
70	1999	Mo & Joe	Live At Billy Bob's Texas	Produced
71	1999	Roy Clark	Live At Billy Bob's Texas	Produced
72	2000	T. G. Sheppard	Live At Billy Bob's Texas	Produced
73	2001	Michael Civisca	Love Is . . .	Produced & Arranged
74	2002	Juice Newton	Live	Co-Produced & Arranged
75	2002	Lorrie Morgan	The Color Of Roses	Co-Produced & Arranged
76	2002	Ronnie Milsap	Live	Co-Produced & Arranged
77	2003	Billy Gilman	Music Through Heartsongs	Co-Produced & Arranged
78	2006	Frankie Valli	Romancing The 60's	Arranged
79	2006	Deana Martin	Memories Are Moad of This	Produced & Arranged
80	2009	Deana Martin	Volare	Produced & Arranged
81	2011	Joe Leo Bwarie	Nothing But Love	Produced & Arranged
82	2013	Deana Martin	Destination Moon	Co-Produced & Arranged
83	2015	Joe Leo Bwarie	The Good Stuff	Produced & Arranged
84	2021	Chris Ruggiero	I Am Chris Ruggiero	Produced & Arranged

Exhibit A

#1 DD - #2 LEV #3 WG

Score for three parts: #1 DD, #2 LEV, and #3 WG. The score is divided into four systems, each containing three staves. The first system (measures 1-7) has a 6/8 time signature for #1 DD and 4/4 for #2 LEV and #3 WG. The second system (measures 8-10) changes to 2/4 for measures 8-9 and 4/4 for measure 10. The third system (measures 11-13) and fourth system (measures 14-16) are in 4/4 time. Chord symbols (F7, Bb, B-, D, A, F, E-9) are placed above the staves. Measure numbers 1 through 16 are indicated below the staves.

The musical score is arranged in four systems, each containing three staves labeled DB, LE, and WG. The key signature is B-flat major (two flats). Measure numbers 17 through 29 are indicated at the beginning of each staff line.

System 1 (Measures 17-19):

- DB:** Measures 17-19. Chords: B \flat , F7, B \flat , F7, B \flat .
- LE:** Measures 17-19. Chords: E-, B-, F \sharp -7, A, B-.
- WG:** Measures 17-19. Chords: D, A7, D, A7, D.

System 2 (Measures 20-22):

- DB:** Measures 20-22. Chords: B \flat , F \sharp -7, A7.
- LE:** Measures 20-22. Chords: F \sharp -7, A7.
- WG:** Measures 20-22. Chords: A7.

System 3 (Measures 23-25):

- DB:** Measures 23-25. Chords: D, G, E-.
- LE:** Measures 23-25. Chords: D, G, E-.
- WG:** Measures 23-25. Chords: D, G, E-.

System 4 (Measures 26-29):

- DB:** Measures 26-29. Chords: A7, D.
- LE:** Measures 26-29. Chords: A7, D.
- WG:** Measures 26-29. Chords: A7, D.